



**FREDERICK COUNTY GOVERNMENT
DIVISION OF COMMUNITY DEVELOPMENT**

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***Planning & Development Review Department
Office of Sustainability & Environmental Resources
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County Manager

MEMORANDUM

DATE: February 27, 2013

To: Donnie Crum, Assistant Superintendent, Highway Operations
Bruce Baust, District 1 Foreman, Highway Operations
Valiree Stine, Fuel Systems Coordinator, Fleet Services

From: Jessica H. Seipp, Project Manager, Frederick County Office of Sustainability and Environmental Resources (OSER) *JHS*

Re: **Frederick County Highway Operations - Thurmont Facility, 02SW1892, Comprehensive Annual Inspection**

Staff from Frederick County's Office of Sustainability and Environmental Resources (OSER) and its consultant Versar, Inc. completed a Comprehensive Annual Inspection of the Frederick County Highway Operations - Thurmont Facility on December 10, 2012. This Comprehensive Annual Inspection was conducted in order to comply with regulations in the facility's General Permit for Discharges from Stormwater Associated with Industrial Activities (02SW1892). Mr. Donnie Crum, Mr. Bruce Baust, Mr. Robert Unger, and Ms. Valiree Stine participated in the inspection.

Included below are findings from the inspection that Highway Operations may want to consider prioritizing for corrective action. Attached is a copy of the completed inspection form which includes detailed findings and additional recommended corrective actions. If you have any questions you may contact me at 301.600.1350 or jseipp@frederickcountymd.gov.

Recommended Corrective Actions for Spill Prevention and Response - The facility's General Permit and SWPPP require that steps are taken to prevent spills from occurring and in the event that they do occur, they are reported and cleaned up properly.

- (1) On the day of the inspection, there was evidence of spills that had occurred. However, spill response forms had not been completed and stored in the SWPPP. In addition, some of the spills had not been cleaned up properly.
 - a. Staff should ensure that a spill form is completed for all spills, that copies of the forms are inserted into the SWPPP, and that the spill reporting procedures outlined in the SWPPP are followed.
 - b. Staff should ensure that all spills are cleaned up using absorbent material or pads and that used material is disposed of properly.
- (2) There is evidence of spills/leaks from the hydraulic lines from snow plows and other hydraulically activated equipment stored in the pole barns. An SOP should be developed and implemented to ensure

these lines are capped when disconnected and that any fluid discharged upon pressure release is captured and/or cleaned up. The floors of the pole barns should be cleaned of all old stains.

Recommended Corrective Actions for Minimizing Exposure – The facility's General Permit and SWPPP require that steps are taken to minimize the exposure of industrial activities to precipitation. Highway Operations should investigate the feasibility of installing secondary containment for the Caliber M1000 tank. If secondary containment is not possible, an SOP should be developed for spill response in the instance that the tank ruptures and all contents are released.

Recommended Corrective Actions for Employee Training - At the time of the inspection, not all staff had received stormwater pollution prevention training. Highway Operations should ensure that all staff receive stormwater pollution prevention training.

Cc:

Thomas Meunier, Director, Division of Public Works

Bill Routzahn, Superintendent, Highway Operations

Pat Hannah, Director of Fleet Services, Division of Public Works

Eric E. Soter, Director, Frederick County Community Development Division

Shannon Moore, Manager, Frederick County Office of Sustainability and Environmental Resources (OSER)

Stormwater Industrial Facility Annual/Comprehensive Inspection Report

SECTION A: GENERAL INFORMATION

Facility Name: Frederick County Highway Operations - Thurmont Facility

NPDES Permit Number: MDE Permit 02SW1892

Facility Address: 7407 Blue Mountain Road, Thurmont, MD 21754

Date of Inspection: December 10, 2012

Start/End Time of Inspection: 8:15 AM – 9:42 AM

Inspector's Name(s) and Contact Information:

Alexi Boado, Watershed Ecologist
ABoado@versar.com
 (410) 740-6054
 Versar, Inc.
 9200 Rumsey Road, Suite 100
 Columbia, MD 21045

Jessica Seipp, Project Manager III
JSeipp@frederickcountymd.gov
 (301) 600-1350
 Frederick County OSER
 30 North Market St.
 Frederick, MD 21701

Facility Representative(s) in Attendance and Contact Information:

Donnie Crum, Asst. Superintendent <u>DCrum@frederickcountymd.gov</u> (301) 600-1565 Frederick County Highway Ops. 331 Montevue Lane Frederick, MD 21702	Bruce Baust, District 1 Foreman <u>BBaust@frederickcountymd.gov</u> (301) 271-7774 Frederick County Highway Ops. 7407 Blue Mountain Rd. Thurmont, MD 21754	Robert Unger, District 1 Asst. Foreman <u>RUnger@frederickcountymd.gov</u> (301) 271-7774 Frederick County Highway Ops. 7407 Blue Mountain Rd. Thurmont, MD 21754	Valiree Stine, Fuel System Admin. <u>VStine@frederickcountymd.gov</u> (301) 600-1572 Frederick County Fleet Services 331 Montevue Lane Frederick, MD 21702
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Weather Information: Weather at time of inspection? [CIRCLE ALL THAT APPLY]

Clear	Cloudy	Rain	Sleet	<input checked="" type="radio"/> Fog	Snow	High Winds	Other:
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SECTION B: REVIEW OF SWPPP

(Note: Per the regulations under the General Discharge Permit for Stormwater Associated with Industrial Activities [02-SW], only item #5 below is a requirement of the Annual Inspection.)

(1) Does the facility have a SWPPP in place?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, provide a brief description explaining reason			
(2) Is the contact information on the cover page of the SWPPP up to date?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, how does the information need to be updated?			
The spill response contractor information needs to be updated.			
(3) Is the Stormwater Pollution Prevention Team up to date?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, how does this information need to be updated?			
(4) Have conditions on-site changed since the last update of the SWPPP?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If YES, how does this information need to be updated?			
There is a new storage shed.			
(5) Are the site map (Attachment B) and list of industrial activities (Section 2.1) up to date?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, how does this information need to be updated?			
The new storage shed needs to be added to the site map. Additional minor revisions were identified during the inspection. All required changes have been noted and will be completed by OSER staff.			
(6) Is the SWPPP signed?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	
If NO, contact the SWPPP team leader to have the document signed immediately.			

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SECTION C: REVIEW OF ROUTINE/QUARTERLY INSPECTION FORMS

(Note: Items reviewed below are a requirement of the facility's SWPPP. Per the regulations under the General Discharge Permit for Stormwater Associated with Industrial Activities [02-SW], they are not a requirement of the Annual Inspection)

(1) Have routine/quarterly inspections been completed?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, provide a brief description explaining reason.			
(2) Have routine/quarterly inspection forms been filed with the SWPPP?	<input checked="" type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, provide a brief description explaining reason.			
(3) Were any corrective actions or necessary maintenance requirements identified on the routine/quarterly inspection forms?	<input type="radio"/> YES	<input checked="" type="radio"/> NO	Additional Comments/Notes
(a) If YES, provide a brief description and indicate whether they were completed.			

SECTION D: REVIEW OF SPILL RESPONSE FORMS

(Note: Items reviewed below are a requirement of the facility's SWPPP. Per the regulations under the General Discharge Permit for Stormwater Associated with Industrial Activities [02-SW], they are not a requirement of the Annual Inspection)

(1) Have any spills been reported for the site?	<input type="radio"/> YES	<input checked="" type="radio"/> NO	Additional Comments/Notes
(a) Provide a brief explanation.			
(2) If spills were reported, were the correct spill response procedures followed?	<input type="radio"/> YES	<input type="radio"/> NO	Additional Comments/Notes
(a) If NO, provide a brief description explaining reason.			

SECTION E: EMPLOYEE TRAINING

(Note: Items reviewed below are a requirement of the facility's SWPPP. Per the regulations under the General Discharge Permit for Stormwater Associated with Industrial Activities [02-SW], they are not a requirement of the Annual Inspection)

(1) Have all employees completed the required employee training?	YES	NO	Additional Comments/Notes
(a) If NO, provide a brief description explaining reason.			
The foremen have received training however the rest of the crewmembers have not. Highway Operations will be providing employee training to general staff in the coming weeks.			
(2) If YES, are sign-in sheets and copies of the training curriculum included in the SWPPP?	YES	NO	Additional Comments/Notes
(a) If NO, provide a brief description why.			

SECTION F: INSPECTION OF BMPs AND AREAS OF INDUSTRIAL ACTIVITIES

STORMWATER POND		Additional Comments/Notes
(1) Does the pond appear to be functioning properly?	YES	NO
(2) Is there an excessive amount of litter in the pond?	YES	NO
(3) Does there appear to be a significant amount of sediment accumulated in the forebay?	YES	NO
(4) If the pond has water, is there an excessive amount of algae present?	YES	NO
(5) Does the inlet(s) have dry weather flow?	YES	NO
(6) If the pond has water, is there an odor?	YES	NO
(7) If the pond has water, is the water discolored?	YES	NO
(8) Is there evidence of erosion present on the banks of the pond?	YES	NO
(9) Is there any other condition that appears to be abnormal?	YES	NO
(a) If YES is circled for any of the questions (2-9) above, provide a description of the condition, corrective action necessary and photo (if possible).		
¹ Dry weather flow = presence of flowing water when it has not rained within the last 48 hours.		

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DRAINAGE SWALE		Additional Comments/Notes
(1) Does the drainage swale appear to be functioning properly?	<input checked="" type="radio"/> YES <input type="radio"/> NO	
(2) Is there an excessive amount of litter in the drainage swale?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(3) Does there appear to be a significant amount of sediment accumulated in the drainage swale?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(4) Is there dry weather flow ¹ in the drainage swale?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(5) If the drainage swale has water, is there an odor?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(6) If the drainage swale has water, is the water discolored?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(7) Is there evidence of erosion along the drainage swale?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(8) Is there any other condition that appears to be abnormal?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(a) If YES is circled for any of the questions (2-9) above, provide a description of the condition, corrective action necessary and photo (if possible).		
¹ Dry weather flow = presence of flowing water when it has not rained within the last 48 hours.		

OUTDOOR DUMPSTERS		Additional Comments/Notes
(1) Do dumpsters appear to be leaking (i.e. is there evidence of staining on the ground)?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(2) Are dumpster lids closed?	<input checked="" type="radio"/> YES <input type="radio"/> NO	
(3) Are dumpster lids in good condition?	<input checked="" type="radio"/> YES <input type="radio"/> NO	
(4) Are dumpsters in good condition?	<input checked="" type="radio"/> YES <input type="radio"/> NO	
(5) Has all waste been disposed of properly?	<input checked="" type="radio"/> YES <input type="radio"/> NO	

POLE BARN/VEHICLE STORAGE BUILDING		Additional Comments/Notes
(1) Is there evidence of spills/leaks (i.e. staining or absorbent materials on the ground)?	<input checked="" type="radio"/> YES <input type="radio"/> NO (If NO, skip to #2)	
(a) Was the source of the spill identified?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(b) Was the source of the spill eliminated?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(c) Was a spill form completed?	<input type="radio"/> YES <input checked="" type="radio"/> NO	
(d) Was the spill reported?	<input type="radio"/> YES <input checked="" type="radio"/> NO	

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(e) Was the spill cleaned up properly?	YES	<input checked="" type="radio"/> NO
<p>- If NO is circled for any of the questions (a-e) above, provide an explanation of why</p> <p>There is staining on the floor, evidence of old spills. All spills require proper spill cleanup and reporting. There is evidence of spills/leaks from hydraulic lines from the snow plows and other hydraulically activated equipment. An SOP should be developed and implemented to ensure these lines are capped when disconnected and that any fluid discharged upon pressure release is captured and/or cleaned up. Floors should be cleaned of all old stains.</p>		
(2) Are any materials, drums, or containers exposed to precipitation?	YES	<input checked="" type="radio"/> NO
(a) If YES, are they sealed and labeled properly?	YES	NO
(3) Are spill kits available for use?	<input checked="" type="radio"/> YES	NO
(a) If YES, do the spill kits need to be restocked?	YES	<input checked="" type="radio"/> NO
(4) Are all drums stored in secondary containment?	<input checked="" type="radio"/> YES	NO
(5) Are all containers properly sealed and labeled?	<input checked="" type="radio"/> YES	NO
(6) Are materials stored in an orderly fashion?	<input checked="" type="radio"/> YES	NO

SALT BARN		Additional Comments/Notes
(1) Is there evidence of spills/leaks (i.e. staining or absorbent materials on the ground)?	YES	Highway Operations should investigate the feasibility of installing secondary containment for the Caliber M1000 tank. If secondary containment is not possible, an SOP should be developed for spill response if the tank were ruptured and all contents were released.
(a) Was the source of the spill identified?	(If NO, skip to #2) YES	
(b) Was the source of the spill eliminated?	YES	
(c) Was a spill form completed?	YES	
(d) Was the spill reported?	YES	
(e) Was the spill cleaned up properly?	YES	
- If NO is circled for any of the questions (a-e) above, provide an explanation of why		
(2) Are Caliber M1000 storage tanks protected and in good condition?	<input checked="" type="radio"/> YES	
(1) Is all salt and Anti-Skid aggregate contained within the salt barn?	<input checked="" type="radio"/> YES	
(2) Has the lot been swept since the last inspection?	<input checked="" type="radio"/> YES	
- If YES, please provide date: December 7, 2012		

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STORAGE TRAILER		Additional Comments/Notes
(1) Is there evidence of spills/leaks (i.e. staining or absorbent materials on the ground)?	YES (if NO, skip to #2)	Re #4 – There are 55-gallon drums kept in the storage trailer (motor oil, hydraulic oil, and transmission oil) which require secondary containment.
(a) Was the source of the spill identified?	YES	
(b) Was the source of the spill eliminated?	YES	
(c) Was a spill form completed?	YES	
(d) Was the spill reported?	YES	
(e) Was the spill cleaned up properly?	YES	
- If NO is circled for any of the questions (a-e) above, provide an explanation of why		
(2) Are any materials, drums, or containers exposed to precipitation?	YES	
(a) If YES, are they sealed and labeled properly?	YES	
(3) Are spill kits available for use?	YES	
(a) If YES, do the spill kits need to be restocked?	YES	
(4) Are all drums stored in secondary containment?	YES	
(5) Are all containers properly sealed and labeled?	YES	
(6) Are materials stored in an orderly fashion?	YES	

STORAGE SHED		Additional Comments/Notes
(1) Is there evidence of spills/leaks (i.e. staining or absorbent materials on the ground)?	YES (if NO, skip to #2)	Re #3 – A spill kit should be provided for this location.
(a) Was the source of the spill identified?	YES	
(b) Was the source of the spill eliminated?	YES	
(c) Was a spill form completed?	YES	
(d) Was the spill reported?	YES	
(e) Was the spill cleaned up properly?	YES	
- If NO is circled for any of the questions (a-e) above, provide an explanation of why		
(2) Are any materials, drums, or containers exposed to precipitation?	YES	
(a) If YES, are they sealed and labeled properly?	YES	
(3) Are spill kits available for use?	YES	

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(a) If YES, do the spill kits need to be restocked?	YES	NO
(4) Are all drums stored in secondary containment?	<input checked="" type="radio"/> YES	NO
(5) Are all containers properly sealed and labeled?	<input checked="" type="radio"/> YES	NO
(6) Are materials stored in an orderly fashion?	<input checked="" type="radio"/> YES	NO

STOCKPILES/HEAVY MACHINERY STORAGE AREA		Additional Comments/Notes
(1) Is there evidence of spills/leaks from heavy machinery (i.e. staining or absorbent materials on the ground)?	YES (If NO, skip to #2)	<input checked="" type="radio"/> NO
(a) Was the source of the spill identified?	YES	NO
(b) Was the source of the spill eliminated?	YES	NO
(c) Was a spill form completed?	YES	NO
(d) Was the spill reported?	YES	NO
(e) Was the spill cleaned up properly?	YES	NO
- If NO is circled for any of the questions (a-e) above, provide an explanation of why		
(2) Are all stockpiles contained within the concrete block area?	<input checked="" type="radio"/> YES	NO
(3) Are materials stored in an orderly fashion?	<input checked="" type="radio"/> YES	NO

FUEL ISLAND		Additional Comments/Notes
(1) Is there evidence of spills/leaks (i.e. staining or absorbent materials on the ground)?	<input checked="" type="radio"/> YES (If NO, skip to #2)	NO
(a) Was the source of the spill identified?	YES	<input checked="" type="radio"/> NO
(b) Was the source of the spill eliminated?	YES	<input checked="" type="radio"/> NO
(c) Was a spill form completed?	YES	<input checked="" type="radio"/> NO
(d) Was the spill reported?	YES	<input checked="" type="radio"/> NO
(e) Was the spill cleaned up properly?	YES	<input checked="" type="radio"/> NO
- If NO is circled for any of the questions (a-e) above, provide an explanation of why		
Staff needs to ensure that all spills are cleaned up and reported as required in the Facility's SWPPP.		
(2) Are spill kits available for use?	<input checked="" type="radio"/> YES	NO

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(a) If YES, do the spill kits need to be restocked?	YES	<input checked="" type="radio"/> NO	
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GENERATOR		Additional Comments/Notes
(1) Is there evidence of spills/leaks inside and/or outside of the housing unit (i.e. staining or absorbent materials on the ground)?	YES <input checked="" type="radio"/> NO (If NO, skip to #2.)	
(a) Was the source of the spill identified?	YES <input checked="" type="radio"/> NO	
(b) Was the source of the spill eliminated?	YES <input checked="" type="radio"/> NO	
(c) Was a spill form completed?	YES <input checked="" type="radio"/> NO	
(d) Was the spill reported?	YES <input checked="" type="radio"/> NO	
(e) Was the spill cleaned up properly?	YES <input checked="" type="radio"/> NO	
- If NO is circled for any of the questions (a-e) above, provide an explanation of why		
(2) Are spill kits available for use?	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
(a) If YES, do the spill kits need to be restocked?	YES <input checked="" type="radio"/> NO	

SECTION G: GENERAL INSPECTION FINDINGS

(1) As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	Additional Comments/Notes
(1) If NO, describe why not		
(2) Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in the SWPPP?	YES <input checked="" type="radio"/> NO	Additional Comments/Notes
(b) If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place		
(3) Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in the SWPPP?	YES <input checked="" type="radio"/> NO	Additional Comments/Notes
(b) If YES, describe the sources of stormwater or non-stormwater pollutants expected to be present		

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in these discharges, and any control measures in place		
(4) Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hotspots?	YES NO	(N/A)
(b) If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review		
(5) Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring		
There was no evidence of pollutants entering the drainage system or discharging to surface waters. The on-site stormwater management pond and drainage swale are in good condition.		
(6) Have you taken or do you plan to take any corrective action, as specified in the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any correcting actions identified as a result of this annual comprehensive site inspection?	YES NO	
(a) If YES, please provide a description		
This is the first annual inspection for this property so there are no corrective actions required from previous inspections. Recommended actions are detailed on the inspection form and in the attached cover memo.		